

A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
80 MAIN STREET, SUITE 260
WEST ORANGE, N.J. 07052
(973) 736-9800

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

[illegible]

1. I am an attorney-at-law of the State of New Jersey and an associate of Bendit Weinstock, P.A., attorneys for plaintiff, Michele Sander ("Sander"). I make this certification in support of

Sander's Motion seeking leave of Court to file a Second Amended Complaint, pursuant to Fed. R. Civ. P. 15(a).

2. On September 30, 2008, Sander filed a First Amended Complaint. Attached as **Exhibit A** is a true copy of Sander's First Amended Complaint.

3. Attached as **Exhibit B** is a true copy of Sander's proposed Second Amended Complaint.


4. By the proposed Second Amended Complaint, Sander seeks to assert claims under Texas law, codified at V.T.C.A., Ins. §101.201 (the Texas Insurance Code) against the PPO Defendants and WEB-TPA (See Exhibit B, Seventh Count), substituting those claims for the claims of common law fraud (See Exhibit A, Fifth Count, ¶8 and Sixth Count, ¶7).

5. In addition to the specific changes stated in paragraph 4 of this Certification, wording changes were made to the Fifth and Sixth Counts of the Complaint and paragraph 2 of the "Jurisdiction and Venue" section of the Complaint.

6. The proposed Second Amended Complaint also omits the defendants who were dismissed from the case, specifically, LDI Pharmacy Services, Intergroup Services, Inc., Spectera, Inc., and United Healthcare Insurance Company.

I certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made by me are
wilfully false I am subject to punishment.

DATED: 9/23/07


KINGSUK BHATTACHARYA